



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AFM  
F. #2016R02228

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 16, 2020

By Email and ECF

Andrew J. Frisch  
One Penn Plaza, Suite 5315  
New York, NY 10119

Re: United States v. Aleksandr Zhukov  
Criminal Docket No. 18-633 (ERK)

Dear Mr. Frisch:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, consisting of the following material:

- **ZHU004180-ZHU004506** – Records relating to an account controlled by the defendant at PNB Bank in Latvia

The following material produced under cover of this letter is designated **sensitive discovery material** pursuant to the protective order issued by the Court on July 31, 2019.

- **ZHU004507-ZHU005213** – Records relating to an account at Bank of America;
- **ZHU005214-ZHU005448** – Records relating to an account at BMO Harris; and
- **ZHU005449-ZHU005516** – Records relating to an account at PNC Bank.

The government also requests reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Alexander Mindlin  
Alexander Mindlin  
Assistant U.S. Attorney  
(718) 254-6433

Enclosures

cc: Clerk of the Court (ERK) (by ECF) (without enclosures)